

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

PAUL JOSEPH VLASAK

PLAINTIFF

v.

CAUSE NO. 3:24-cv-194-DPJ-ASH

MARLA HALL, ET AL.

DEFENDANTS

REBUTTAL IN SUPPORT OF PLAINTIFF PAUL VLASAK'S MOTION
OBJECTING TO DEFENDANT GRATIANA HANDY'S MOTION TO DISMISS
FOR INSUFFICIENT SERVICE OF PROCESS

COMES NOW PLAINTIFF PAUL J. VLASAK, PRO SE AND MOVES THIS HONORABLE COURT TO DISMISS DEFENDANT GRATIANA HANDY'S REBUTTAL MOTION FILED IN THIS HONORABLE COURT ON 08-01-2025 BY JACK F. HALL (MSB 106482), ATTORNEY FOR THE DEFENDANT GRATIANA HANDY. IN SUPPORT OF THIS MOTION PLAINTIFF SHOWS UNTO THE COURT AS FOLLOWS:

(1) ON 7/18/2025 THIS HONORABLE COURT DIRECTED THE PLAINTIFF TO FILE A RESPONSE TO DEFENDANT HANDY'S MOTION TO DISMISS ON OR BEFORE 8/4/25 SIGNED BY HONORABLE JUDGE ANDREW S. HARRIS ON 7/18/2025. SEE: EXHIBIT 'A'.

(2) ON 7/30/2025 AT 9:17 A.M. CDT LAURA TILEY, ILAP DIRECTOR ELECT-IRONICALLY FILED ON BEHALF OF PLAINTIFF HIS SIGNED AND NOTARIZED AND RECORDED IN 206 BOOKA RESPONSE TO DEFENDANT HANDY'S MOTION TO DISMISS WITH CLERK, U.S. DISTRICT COURT. SEE: EXHIBIT 'B', UPLOADED DOCUMENT, CONT.

ALSO ON THIS SAME DATE OF 7/30/2025, LAURA TILEY, ILAP DIRECTOR, MADE ALL NECESSARY COPIES, SIGNED AND NOTARIZED, AND RECORDED ALL THREE PETITIONS IN THE OFFICIAL LOG BOOK, AND MAILED BY UNITED STATES POSTAL SERVICE, @ LEAKSVILLE, MS., WITH ADEQUATE POSTAGE TWO SEPARATE LEGAL ENVELOPES, TWO: #1.) WISE CARTER CHILD AND CARAWAY, PA - ATTNO CHARLES E. COWAN 401 E. CAPITAL ST, STE. 600, P.O. BOX 451, JACKSON, MISSISSIPPI 39205.
#2.) GRATIANA HANDY, MDC SUPERVISOR @ MADISON COUNTY DETENTION CENTER 2935 HWY. 51, CANTON, MISSISSIPPI 39046.

3.) SO NOW JACK F. HALL (MSB #104478) ON 8/1/2025 FILED THIS REBUTTAL. THIS INTENTIONAL DELAY TACTIC IS INSULTING AND PLAINTIFF HEREBY OBJECTS TO THESE FALSE ALLEGATIONS THAT HE HAS NOT DEMONSTRATED VALIDITY OF SERVICE. WHEN JACK F. HALL, HIMSELF HAS NOT RESPECTED OR ABIDED BY THE FEDERAL RULES OF CIVIL PROCEDURE, BY NOT FILING HIS "ENTRY OF APPEARANCE," NOT FULFILLING HIS OWN BURDEN.

CHARLES E. COWAN PROVIDED HIS PERSONAL "NOTICE OF ENTRY OF APPEARANCE," RESPECTFULLY WAS SUBMITTED, THE 1ST DAY OF JULY 2025; NOT JACK HALL.

4.) PLAINTIFF ALSO, FOR THE RECORD OBJECTS TO DEFENDANT GRATIANA HANDY, AND WISE CARTER CHILD AND CARAWAY PA / LAW FIRM. WITHOUT GOOD CAUSE HAS NOT RESPECTED THIS 3/22/2025 COURT SUMMONS ORDER..

"WITHIN 21 DAYS OF SERVICE OF SUMMONS DESCRIBED IN FED. R. CIV. P. 12(1)(2)OR(3) YOU 'MUST' SERVE ON THE PLAINTIFF AN ANSWER TO THE ATTACHED COMPLAINT OR A MOTION UNDER RULE 12 OF THE F.R.C.P. THE ANSWER OR MOTION MUST BE SERVED ON PROPER PLAINTIFF. WHOSE NAME AND ADDRESS ARE:
PAUL JOSEPH VLASAK, MOOC # 236470, SOUTH MISSISSIPPI CORRECTIONAL INSTITUTION,
2-B-1-A, P.O. BOX 1419, LEAKSVILLE, MS. 39451.

WHEREFORE,

PLAINTIFF HAS ABSOLUTELY FOLLOWED AND RESPECTED EACH AND EVERY ORDER OF THIS HONORABLE COURT, ALL WITHIN THE TIME ALLOWED ON THE COURT ORDERS.

PLAINTIFF CONSENDS THAT HE HAS DEMONSTRATED A EXCEPTIONAL, EXTRAORDINARY PERFORMANCE WITH ALL HIS PRO SE FILINGS, MOTIONS, AFFIDAVITS AND HAS PROVIDED SUFFICIENT SERVICE OF PROCESS, AND SERVICE OF SUMMONS. THEREFORE PLAINTIFF ASK THIS HONORABLE COURT TO DISMISS THE REBUTAL FILE ON 8/1/2025, WITH PREJUDICE.

PLAINTIFF REQUEST THAT JUDGEMENT OF DEFAULT BE ENTERED AGAINST THE DEFENDANT HANBY IE SHE FAILS TO RESPOND WITHIN 21 DAYS DESCRIBED IN FED.R.CIV.P. 12(a)(2) OR 3. ALL PARTYS NEED TO RESPECTFULLY COMMUNICATE TO BE ABLE TO CONCLUDE ALL FINAL REMEDIES.

RESPECTFULLY SUBMITTED, THIS 13TH DAY OF AUGUST 2025.

Paul Joseph Vlasak
PAUL JOSEPH VLASAK # 236470
PLAINTIFF, PRO-SE@SMCI-2-B-1-A
P.O. Box 1449 LEADSVILLE, MS. 39451

THE MATTERS AND FACTS SET FORTH IN THE ABOVE AND FOREGOING MOTION ARE TRUE AND CORRECT AS THEREIN STATED.

SWEORN TO AND SUBSCRIBED BEFORE ME THIS 13TH DAY OF AUGUST 2025





Notary

STATE OF Mississippi
County of Greene

CERTIFICATE OF SERVICE

I Paul Joseph Vlasak, hereby CERTIFY THAT ON THIS
13th DAY OF AUGUST 2025. THE FOREGOING PLEADING AND OTHER PAPERS
WAS MOVED UPLOADED ELECTRONICALLY FILED WITH THE CLERK,
UNITED STATES DISTRICT COURT, FOR THE SOUTHERN DISTRICT
OF MISSISSIPPI, NORTHERN DIVISION.

A TRUE AND CORRECT COPY OF THE SAME WAS SENT BY UNITED
STATES POSTAL SERVICE WITH ADEQUATE POSTAGE TO:

1.) WISE CARTER Child, AND CRAWFORD, PA, ATT: Charles E. Cowan @
401 E. CAPITAL ST., STE. 600, P.O. BOX 451, JACKSON, MS. 39205

AND MAILED TO:

DEFENDANT GRATIANA HANCOCK, M.C.D.C. SUPERVISOR @
MAISON COUNTY DETENTION CENTER
2935 HWY. 51
CANTON, MISSISSIPPI, 39046.

SO CERTIFIED THIS 13th, DAY OF AUGUST 2025.